



November 15, 2021

By ECF

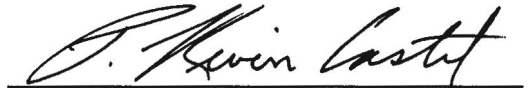
The Honorable P. Kevin Castel
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 11D
New York, NY 10007

The deadline for filings are extended by 14 days. The November 23 hearing is adjourned to a date to be set after hearing further from the parties in 14 days.

SO ORDERED.

Dated: New York, New York
November 15, 2021

Re: *SEC v. Gallagher*, No. 1:21-cv-08739-PKC


P. Kevin Castel
United States District Judge

Dear Judge Castel:

I write on behalf of Defendant Steven M. Gallagher, and with the consent of Plaintiff Securities and Exchange Commission (SEC), to request that the show cause hearing currently scheduled for November 23, 2021 (*see* Dkt. No. 15) be adjourned for two weeks, until December 7, 2021. Consistent with that adjournment, I further request that Defendant's opposing papers to the Order to Show Cause be filed no later than 5:00 pm on December 2, 2021, and Plaintiff's reply papers be filed no later than 5:00 pm on December 6, 2021. The October 26, 2021 Order (Dkt. No. 11) would otherwise remain in effect during this adjournment.

In support of this letter requesting adjournment, the defense represents that we are in active negotiations with the SEC regarding the show cause hearing and the temporary restraining order, and that the parties, given more time, may reach a resolution that would negate the need for a hearing.

This is Mr. Gallagher's second prior adjournment request. The first request for a two-week adjournment was filed on October 29, 2021 (*see* Dkt. No. 13), and was granted by this Court (Dkt. No. 15).

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Eric Rosen
Eric Rosen
ROCHE FREEDMAN LLP
99 Park Avenue, Suite 1910
New York, New York 10016
(617) 977-4163
erosen@rochefreedman.com

CC: Counsel of Record